

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

BLUE MACELLARI,
an individual,

Plaintiff,

v.

RUSTY CARROLL, an individual, R2C2,
INC., a corporation, and
DIGITALSMITHS CORPORATION, a
corporation,

Defendants.

Case No. 05-4161-JPG-CJP

CONSENT MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENDANTS'
MOTIONS TO DISMISS

CONSENT MOTION FOR EXTENSION OF TIME

Due to ongoing and productive settlement negotiations between Plaintiff Blue Macellari and Defendants Rusty Carroll, R2C2, Inc., and Digitalsmiths Corporation (collectively, the "Defendants") which ensued on October 20, 2005, Plaintiff Blue Macellari hereby requests an extension of time during which to respond to the Defendants' pending motions to dismiss. Plaintiff respectfully requests the Court extend the date to January 15, 2005. All Defendants consent to Plaintiff's request.

1. Since October 20, 2005, Plaintiff and Defendants have been engaged in good faith efforts to resolve the current dispute amicably and without further action before the Court.
2. Plaintiff respectfully requests, with Defendants' consent, the Court extend the date during which Plaintiff may respond to all pending motions to dismiss to January 15, 2005.
3. As required by Local Rule 7.1, a proposed Order has been submitted.

Dated: December 6, 2005

Respectfully submitted,

By: /s/ Evan A. Parke

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